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10 GLORIA MALDONADO and AUDRA GUTIERREZ

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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 ROBERT ANSARA, as Special Administrator of
13 the estate of D.B., born December 18, 2015 and
14 died August 15, 2017 and GABRIELLE
15 BRANON-CHESLEY, individually, as the Natural
16 Mother of D.B., David Banks, individually and as
17 the Natural Father of D.B.,

18 Plaintiffs,

19 v.

20 GLORIA MALDONADO, individually; AUDRA
21 GUITERREZ, individually; CLARK COUNTY,
22 a political subdivision of the State of Nevada;
23 DOE individuals I-XX; ROE CLARK COUNTY
24 DEPARTMENT OF FAMILY SERVICES
25 EMPLOYEES I-XX, individually and in their
26 official capacities; TROPICANA DE, LLC, d/b/a
27 SIEGAL SUITES OF TROPICANA, a Foreign
28 Limited Liability Corporation; AND DOE
SECURITY COMPANY and ZOE
CORPORATIONS XXI-XXX,

Defendants.

CASE NO. 2:19-cv-01394-GMN-VCF

**STIPULATION TO EXTEND TIME
TO RESPOND TO PLAINTIFFS'
SECOND AMENDED COMPLAINT**

(FIRST REQUEST)

22
23 COME NOW Plaintiffs ROBERT ANSARA, as Special Administrator of the estate of
24 D.B., born December 18, 2015 and died August 15, 2017 and GABRIELLE BRANON-
25 CHESLEY, individually, as the Natural Mother of D.B., David Banks, individually and as the
26 Natural Father of D.B. and Defendants COUNTY OF CLARK, GLORIA MALDONADO and
27 AUDRA GUTIERREZ, by and through their undersigned counsel of record and hereby

1 stipulate to extend the time for Defendants COUNTY OF CLARK, GLORIA MALDONADO
2 and AUDRA GUTIERREZ (“County Defendants”) to respond to Plaintiffs’ Second Amended
3 Complaint (ECF No. 64). County Defendants’ response to Plaintiffs’ Second Amended
4 Complaint is currently due on 6/11/2020. This is County Defendants’ first request for an
5 extension based on other case obligations. The parties have agreed to extend Defendants’
6 response to Plaintiffs’ Second Amended Complaint to 6/25/2020. This Stipulation is submitted
7 in good faith and not for the purpose of undue delay.

9 DATED this 4th day of June, 2020

10 DATED this 4th day of June, 2020

11 /s/ Samantha A. Martin, Esq.

12 Samantha A. Martin, Esq.
Nevada Bar No. 12998
13 RICHARD HARRIS LAW FIRM
801 South Fourth Street
14 Las Vegas, Nevada 89101
Attorneys for Plaintiff

15 /s/ Felicia Galati

16 Felicia Galati, Esq.
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18 Attorneys for Defendants CLARK
COUNTY DEPARTMENT OF FAMILY
SERVICES, COUNTY OF CLARK,
GLORIA MALDONADO, AUDRA
GUITIERREZ/GUERRO,
YOLANDA KING and TIM BURCH

19 **ORDER**

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21 IT IS SO ORDERED, that Defendants COUNTY OF CLARK, GLORIA
22 MALDONADO AND AUDRA GUTIERREZ have until 6/25/2020 to respond to Plaintiffs’
23 Second Amended Complaint.

24 DATED: 6-5-2020

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26 _____
27 CAM FERENBACH
28 UNITED STATES MAGISTRATE JUDGE